

Rule 21 Working Group Meeting #33 - Agenda

May 30, 2002

Pacific Gas & Electric

1919 Webster Street

Oakland, CA

Meeting Agenda

9:30 am – 4:00 pm

Combined Group Discussion 9:30 am to 10:30 am

- Introductions & Next Meeting Location – Fontana: Wednesday June 19
- Utility DG Activity Sheets – SCE some new applications for DG on line; 67MW site not yet seeking permit with CEC; a few 10kW sites none larger.
- Status of Utility Advice Letter Filings – SDG&E: May 17, Rule 21 filed; May 18, Cook Compliance filed; May 31, 4 out of 5 Rule 21 agreements to be filed; SCE revised Rule 21 to file June 3 or 4; PG&E: last week filed 2 agreements; still working on inadvertant export or non-export, should be filed within 1 month for inadvertant export; revised Rule 21 to be filed within next 2 weeks (by June 13).
- Other Filings forthcoming (cost accounting, etc.) – Question whether PG&E was amending the Net Energy Metering agreement that is currently confusing and improbable that a homeowner would understand it.
- Status of Standard Interconnection Agreements (See advice filings above...)
- Certification of Plug Power 5kW – (SU-1...Approved for certification by the group today!)
- FOCUS contract Amendment for an Interconnection Handbook and P1547 support "Approved Subject to Governor's Executive Order" on sole-source contracts (executive order has not been released).
- Certification, utilities say, does not imply endorsement—so statement by state of CA to help clarify what it means. CEC and PG&E have been working on a statement regarding Xantrex inverters.
- White paper comments for DG site monitoring coming back from utilities. No major objections at this point. PG&E agreed in principle to choose three challenging DG sites to monitor.
- Supplemental REview process update: Four areas defined:
 - Export (Screen 2) Subcommittee: Chuck W. leads this section: looking for comments on Screen 2; document is out at this meeting;
 - 15% Line Segment (Screen 4) Subcommittee : Bill Cook leads. Looking for comments. Mfrs are looking for guidance on cost (effort, timing, process) for supplemental review. Utility field personnel can still obstruct the process. What is the value of the Supplemental Review document guideline? Bill C. clarified that this document will not be a PUC-approved document. Mohammed V. says Guideline is what utility protection engineer will follow, and so it will be a powerful and useful document. Ed G. said document should be useful for consumer—Chuck W says the DG Guidebook is the place for the simple

explanation accessible to the consumer. Final product within about 2 months for this section.

- Non-certified Equipment (Screen 3) Subcommittee: Mohammed V. leads. Group has not met yet, though there are 15 people signed up; R21 WG discussed whether this was a valuable process and agreed that it was IF the groups could come up with language that could avoid detailed studies.
- SCCR requirements (Screen 7) Subcommittee: Ed G. came out with initial document for this meeting on Screen 7, then wrote a draft of Screen 8.

Non-Technical Breakout (Rest of the Day with a Lunch Break)

- Continuation of morning discussion (if necessary)
- Rule 21 Language Update: Section F (Telemetry, Metering, et al) --
ISO and CAC / EPUC had conflict that was worked out in present Section F; however there is a sunset provision that must be amended by end of this year. Dylan made a drawing that lays out the metering issues at a site (he will send an electronic version to me for sending out to the group). ISO is waiting for a FERC ruling (ER 98-997); Tom D. says the present Section 6 is permissive for the utilities, giving them ability to say how they meter and telemeter; John C. of ISO, Dylan of PG&E agree that extending sunset provision is preferable to changing the rule. FERC GIA (Generator Interconnection Agreement) and GIP (Generator Interconnection Process) of NOPR (ANOPR is progenitor). Would ISO discriminate between a QF and non-QF generator (non-export)? ISO: Answer depends whether gen is <or> 1MW; John C. said the case of the gen not exporting (100% on-site load) that ISO has not made a sharp discrimination. Best case is to work through IOUs. Jerry J. says that FERC/ISO involvement may make interconnecting DG more difficult, as a barrier. Scott T. suggests that legal teams look at extending sunset provision. John C. will send some relevant FERC documents.
- Development and Review of Equipment Certification Language -- (Tech Group) not discussed.
- Tariff matrix – Mike Mazur, updated with PG&E tables & input from SCE & SDG&E – SDG&E said that the tariff was not the most common one; straight-line costing was not quite germane. Mike will complete a "Capstone costing guide" that will include all that he has gained from utilities so far. (He has now received feed back from all 3 IOUs.) Exit fees not currently included in the model. This model will go on the Energy Commission website as an economic model.
- FERC ANOPR: wanted to develop 3 topics: 1. common Interconnection Agreement; 2. common Interconnection Procedures; 3. common Best Practices. Then NOPR came along. PG&E is filing comments on NOPR. FERC has reopened the question of transmission vs distribution on grounds of wholesale power transaction. Section 218 (cogen over-the-fence) are WDAT. The question raised by this process is extent of FERC jurisdiction—future impact on Rule 21.
- BIN LIST officially established—BIN LIST Edits and Items from 4-29-2002 here:

***** 04-29-2002 *****

The group decided to go over the document at the meeting rather than putting it off to a conf. call. Section B5: Tom D. suggests no change. C1b: delete word "screening"; term "Application Fee" should be stricken (doesn't occur here, but later in doc) and "Initial Review Fee" should be used in all cases. Delete "and Supplemental". Add word "(additional)" after \$600 (had been in v28d). Section C1c1 revert to original language in v28d. C1d: change "and" to "or" [4th line]. C1i. Werner B. says "true up" should not include application fee; take out "Initial and Supplemental Review Fee" and say "...against any advance payments...". D1a remove double colon. E3a Utilities have discretion to put their own language there (SCE will not others will). E3d SCE will have "Special Facilities", PG&E, SDG&E will have "Added Facilities"—each will define the term. E3d revert to 28d, strike "financed" add "operated". F3: lettering changes. + last sentence: "in exercising its discretion to require Net Generation Metering..." reinstated to 28d. Section H: Distribution Service: Peter O. added language stands. Revert to 28d for "Initial Review" and "Supplemental Review" separate: in "Supplemental Review" delete the word "Process" after words "Initial Review". "Supplemental Review" "a)strike "Simplified" add "Approval of" Interconnection Facilities: Werner B. : should it include "engineering and design"? It's in the BIN for next time (below). Screening will not be defined. I3 – Retitle the flowchart to "Initial and Supplemental Review Flowchart". J1 3rd paragraph, capitalize "Generators". 7a1: strike "the Non Exporting" put in "Screen 2".

Advice Letter Filings = Tom D.'s version 4/14 + today's changes Pat of SCE will do this; Mary T. of SDG&E will do a doc compare with v28d. Will be done by end of week + whatever time legal dept's need for review.

List of Items to take up after Advice Letter filings:

1. C1d. Last 2 sentences: Facility design & engineering included in \$5000? Also: definition of Interconnection Study... does it include engineering and design?
2. Note: Utility-specific language should be noted (by color) in next Compilation
3. Add "inverter" to definitions?
- 4.

**** End of 4-29-2002 Bin List *****

New Bin List:

Mary Turley's copy (she will email it to me) with Werner's comments (all but one page, which she will fax to me) FROM that I WILL PREPARE A COMPLETE BIN LIST. Send it to Werner first for his comments, then send it to the group.

*****end of bin list*****

- CPUC Decision 02-37-057 Follow-up

Jerry J. asked for clarification on: ARe utilities to collect electric Rule 21 <1MW or all electric Rule 21 (any size)? Scott will ask the PUC ALJ. SCE is opting to track by project; the others will track by bin.

Technical Breakout (Rest of the Day with a Lunch Break)

For each of the four Supplemental Review Topics:

- Export (Screen 2) Subcommittee
Identify and discuss: 1) Roster, 2) Outline, 3) Initial Writing assignments, 4) Draft text for review
- 15% Line Segment (Screen 4) Subcommittee
Identify and discuss: 1) Roster, 2) Outline, 3) Initial Writing assignments, 4) Draft text for review
- Non-certified Equipment (Screen 3) Subcommittee
Identify and discuss: 1) Roster, 2) Outline, 3) Initial Writing assignments, 4) Draft text for review
- SCCR requirements (Screen 7) Subcommittee
Identify and discuss: 1) Roster, 2) Outline, 3) Initial Writing assignments, 4) Draft text for review

Next Meeting

- FERC issues will become a standing items (Jerry J. will report)
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